

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: Docket No. 949

**CERTIFICATE OF NO OBJECTION REGARDING SECOND MONTHLY FEE
APPLICATION OF WOMBLE BOND DICKINSON (US) LLP COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL
FOR THE DEBTORS AND DEBTORS IN POSSESSION FOR THE PERIOD FROM
NOVEMBER 1, 2023 TO AND INCLUDING NOVEMBER 30, 2023**

The undersigned hereby certifies that, as of the date hereof, they have received no answer, objection, or other responsive pleading with respect to the second monthly fee application for compensation and reimbursement of expenses (the “**Monthly Application**”) of Womble Bond Dickinson (US) LLP (the “**Applicant**”) listed on **Exhibit A** attached hereto. The Monthly Application was filed with the United States Bankruptcy Court for the District of Delaware (the “**Court**”) on February 5, 2024. The undersigned further certifies that they have reviewed the Court’s docket in this case and no answer, objection or other responsive pleading to the Monthly Application appears thereon. Pursuant to the Notice of Fee Application filed with the Monthly Application, objections to the Monthly Application were to be filed and served no later than **February 26, 2024 at 4:00 p.m. (ET)**. The Monthly Application was filed and served in accordance with the *Order Establishing Procedures for Interim Compensation and*

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

Reimbursement of Expenses for Chapter 11 Professionals and Committee Members, entered July 25, 2023 [D.I. 181] (the “**Interim Compensation Order**”).

Consequently, pursuant to the Interim Compensation Order, the debtors and debtors in possession in the above-captioned cases are authorized to pay Applicant eighty percent (80%) of the fees and one hundred percent (100%) of the expenses requested in the Monthly Application upon the filing of this certification without the need for a further order of the Court. A summary of the fees and expenses sought by Applicant is annexed hereto as **Exhibit A**.

Dated: February 28, 2024
Wilmington, Delaware

Respectfully submitted,

<p><u>/s/ Morgan L. Patterson</u> WOMBLE BOND DICKINSON (US) LLP Donald J. Detweiler (DE Bar No. 3087) Morgan L. Patterson (DE Bar No. 5388) 1313 North Market Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 252-4320 Facsimile: (302) 252-4330 don.detweiler@wbd-us.com morgan.patterson@wbd-us.com</p> <p><i>Counsel to the Debtors and Debtors in Possession</i></p>	<p>WHITE & CASE LLP Thomas E Lauria (admitted <i>pro hac vice</i>) Matthew C. Brown (admitted <i>pro hac vice</i>) Fan B. He (admitted <i>pro hac vice</i>) 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131 Telephone: (305) 371-2700 tlauria@whitecase.com mbrown@whitecase.com fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 819-8200 david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>) 111 South Wacker Drive, Suite 5100 Chicago, IL 60606 Telephone: (312) 881-5400 jzakia@whitecase.com</p>
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	<p>Roberto Kampfner (admitted <i>pro hac vice</i>) Doah Kim (admitted <i>pro hac vice</i>) RJ Szuba (admitted <i>pro hac vice</i>) 555 South Flower Street, Suite 2700 Los Angeles, CA 90071 Telephone: (213) 620-7700 rkampfner@whitecase.com doah.kim@whitecase.com rj.szuba@whitecase.com</p> <p><i>Counsel to Debtors and Debtors in Possession</i></p>
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EXHIBIT AProfessional Fees and Expenses
Monthly Fee Application

Applicant	Fee Application Period, Filing Date, D.I.	Total Fees Requested	Total Expenses Requested	Objection Deadline:	Amount of Fees Authorized to be Paid @ 80%	Amount of Expenses Authorized to be Paid at 100%	Amount of Holdback Fees Requested
Womble Bond Dickinson (US) LLP	11/1/23 – 11/30/23 D.I. 949	\$80,000.00	\$51.30	2/26/24	\$64,000.00	\$51.30	\$16,000.00